<u>REMARKS</u>

This application has been carefully reviewed in light of the Office Action dated June 19, 2008. Claims 1 to 11 and 13 to 15 are pending in the application, of which Claims 1, 10, 14 and 15 are independent. Reconsideration and further examination are respectfully requested.

Claims 10 and 11 were rejected under 35 U.S.C. § 112, second paragraph for alleged indefiniteness. Without conceding the correctness of the rejection, Claim 10 has been amended to be in independent form. Accordingly, Applicants respectfully request withdrawal of this rejection.

Claims 12 and 13 were rejected under 35 U.S.C. § 101 for allegedly being directed to non-statutory subject matter. Without conceding the correctness of the rejection, Claim 12 has been canceled and Claim 13 now depends from Claim 14. In addition, the specification has been amended to clarify that a computer-readable medium does not include signals. Accordingly, Applicants respectfully request withdrawal of this rejection.

Claims 1 to 3, 5 to 9 and 12 to 15 were rejected under 35 U.S.C. § 103(a) over U.S. Patent Application Publication No. 2004/0201613 (Simpson) in view of U.S. Patent No. 6,978,445 (Laane). Claim 4 was rejected under 35 U.S.C. § 103(a) over Simpson in view of Laane and further in view of U.S. Patent Application Publication No. 2002/0046238 (Estavillo). Claim 10 was rejected under 35 U.S.C. § 103(a) over Simpson in view of Laane and further in view of U.S. Patent Application Publication No. 2002/0143814 (Hepworth). Claim 11 was rejected under 35 U.S.C. § 103(a) over Simpson in view of Laane in view of Hepworth and further in view of U.S. Patent No. 7,047,033 (Wyler). Reconsideration and withdrawal of these rejections are respectfully requested.

The present invention relates to the dynamic adjustment of the scale of individual frames and their height so that the width of the print media is not exceeded, while substantially maintaining the layout of the web page as presented to the user upon a display screen. The dynamic adjustment is determined by determining for each frame a record of corresponding frame dependencies and then operating upon each frame to create a corresponding display region into which appropriate content of the corresponding frame is placed. Accordingly, the dynamic adjustment of the scale of individual frames is achieved.

Turning to specific claim language, amended independent Claim 1 is directed to a method of forming a printable representation of a document having framed content. The method includes the steps of (a) recording the position, height and width of each frame of the document in a display widow in which the document is presented; (b) identifying dimensions of a printing medium associated with the printable representation; (c) determining a height of content of each frame; (d) determining, for each frame, a record of any corresponding dependency frames, each dependency frame being above the frame in the display window; (e) interpreting the records to establish a display order of the frames; (f) for each frame, and in display order: (fa) checking a start position of the frame against an end position of a created display region of a frame upon which the frame is dependent, and setting the start position to be the end position; (fb) creating a display region upon a page in the printable representation at the start position according to the corresponding content height; (fc) placing the content of the frame into the display region; and (fd) where the display region exceeds a page limit in the printable representation, terminating the display region at the page limit and creating a further display region upon a following page of the printable representation.

Applicants submit that Simpson and Laane, whether taken alone in combination, fails to disclose all of the features of the present invention. Specifically, Simpson and Laane fail to disclose or suggest determining, for each frame of a plurality of frames, a record of any corresponding dependency frames, each said dependency frame being above said frame in said display window and interpreting the records to establish a display order of said frames. Then, for each said frame, and in said display order: checking a start position of said frame against an end position of a created display region of a frame upon which said frame is dependent, and setting said start position to be said end position; creating a display region upon a page in said printable representation at said start position according to said corresponding content height; placing the content of said frame into said display region; and where said display region exceeds a page limit in said printable representation, terminating the display region at the page limit and creating a further display region upon a following page of the printable representation.

Simpson, by contrast, is not concerned with dynamic scaling of page elements nor does Simpson address the problem of printing a web page to match, as closely as possible, the presentation of the web page on the display screen. Instead, Simpson is directed to a method and system for allowing a user to manually arrange content, such as images or graphics, on a page which may then be saved or printed. Fundamentally, Simpson is concerned with a user's layout of the document to suit the user's preferences. Simpson does not disclose or suggest the dynamic layout of screen content in a document in order to preserve the layout of the content when the document is printed.

In the Office Action, it is contended that paragraph [0059] discloses the step of "interpreting the records to establish a display order of said frames". In fact, however paragraph [0059] of Simpson merely discusses the ability of the user to manipulate and add further pages to

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their composition document. More significantly, Simpson does not involve any interpretation of the record which defines the frame relationship (ie: the analysis of an existing frame arrangement) to determine the display order for the frames. Simpson describes user manipulation by rotating and scaling a constituent portion.

In addition, the Office Action contends Simpson discloses the feature of, where said display region exceeds a page limit in said printable representation, terminating the display region at the page limit and creating a further display region upon a following page of the printable representation, in paragraph [0053] and Figure 8 of Simpson. However, paragraph [0053] and Fig. 8 simply describe and illustrate, respectively, how a user can navigate between pages. Therefore, Applicants submit that there is no discussion in Simpson of the laying out of content to span across a number of pages as expressly recited in step.

Furthermore, Laane is concerned purely with the loading of a page and not with issues surrounding the printing of displayed pages to preserve layout. As a consequence, it is not understood how a person of ordinary skill would utilize the disclosure of Laane, which is unconcerned with printing of documents, to deal with a printing issue. It is also noted that Laane is concerned with "data interdependency among frames 310, which may then require these frames to be loaded in some particular order when page 300 is loaded by the browser." (See Laane, column 5, lines 38 to 41).

In contrast, the present invention is concerned with the display and printing of frames, not with the order in which the frames are loaded to a browser for display. In the Office Action, the issues of displaying framed content with printing frame content are confused. The present invention is concerned with the accurate printing of framed content to replicate the manner in which the framed content is displayed.

Further, in Laane there is no disclosure or suggestion of checking a start position of the frame against an end position of a created display region of a frame upon which the frame is dependent, and setting the start position to be the end position. However, in the Office Action, it is contended that such a feature is shown in Fig. 3 of Laane. However, what is shown in the figure is a display, which is merely the starting point and not the result of the operation of the apparatus of Claim 1.

In this regard, it is asserted in the Office Action that "[it] would have been obvious to a person of ordinary skill in the art at the time of the invention was made to combine Simpson with Laane to add framed dependency…[the] motivation for doing so would have been to correctly display the loaded page." Applicants respectfully submit, that no such motivation exists because frame dependency only becomes relevant when considering dynamic layout as specifically disclosed in the present invention. In Simpson, there is no motivation to add the frame dependency aspect because the user manually arranges the pages to his or her liking. Simpson does not disclose or suggest any need for a system to undertake any analysis of the dependency between frames. The disclosure of Laane does not make up for these deficiencies. It follows therefore that neither Laane or Simpson either individually or in any permissible combination disclose or suggest the specific combination of features recited in independent Claim 1.

Accordingly, Applicants submit that Claim 1 is now in condition for allowance and respectfully request same.

Claims 10, 14 and 15 are directed to a method, a computer-readable medium and a system, respectively, substantially in accordance with the apparatus of Claim 1.

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Accordingly, Applicants submit that Claims 10, 14 and 15 are also in condition for allowance and respectfully request same.

The other pending claims in this application are each dependent from the independent claims discussed above and are therefore believed patentable for the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

CONCLUSION

No claim fees are believed due; however, should it be determined that additional claim fees are required, the Director is hereby authorized to charge such fees to Deposit Account 06-1205.

Applicants' undersigned attorney may be reached in our Costa Mesa, CA office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

/Frank Cire #42,419/
Frank L. Cire
Attorney for Applicants

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3800
Facsimile: (212) 218-2200

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